

1 John M. Naylor
Nevada Bar No. 5435
2 Andrew J. Sharples
Nevada Bar No. 12866
NAYLOR & BRASTER
3 1050 Indigo Drive, Suite 200
Las Vegas, NV 89145
4 (T) (702) 420-7000
(F) (702) 420-7001
5 jnaylor@nblawnv.com
asharples@nblawnv.com
6

7 *Attorneys for Defendants Pacific Payment*
Technologies d/b/a Ubiquity, Tre'lage, LLC,
8 *Neil Haboush, Neil Sollinger, Mark Soller,*
Pasha Sollinger and Nancy LaBier

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**
11

12 GAIA BOTANICALS, LLC,

13 Plaintiff,

14 v.

15 PACIFIC PAYMENT TECHNOLOGIES,
16 LLC d/b/a, UBIQUITY, TRE'LAGE, LLC,
MARIN RAIN, INC., NEIL HABOUSH,
17 NEIL SOLLINGER, MARK SOLLER,
JAMES T. LOVERN, PASHA SOLLINGER,
18 NANCY E. LABIER, Does 1-50 and XYZ
Corps., 1-50,

19 Defendants.
20

Case No. 2:18-cv-00789-APG-PAL

**JOINT STIPULATION AND ORDER
EXTENDING DEFENDANTS PACIFIC
PAYMENT TECHNOLOGIES, LLC d/b/a,
UBIQUITY, TRE'LAGE, LLC, NEIL
HABOUSH, NEIL SOLLINGER, MARK
SOLLER, PASHA SOLLINGER AND
NANCY E. LABIER'S TIME TO FILE AN
ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

Complaint filed: May 1, 2018

21 Plaintiff, Gaia Botanicals, LLC ("Plaintiff"), and Defendants Pacific Payment
22 Technologies d/b/a Ubiquity, Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha
23 Sollinger and Nancy LaBier ("Stipulating Defendants"), by and through their respective counsel,
24 file this Joint Stipulation Extending Defendants' Time to File an Answer or Otherwise Respond to
25 Plaintiff's Complaint (First Request). Stipulating Defendants request an extension up to and
26 including August 17, 2018 to answer or otherwise respond to Plaintiff's Complaint.

27 Plaintiff filed its Complaint on May 1, 2018. (ECF No. 1). Summons were issued to all
28

1 Defendants on June 19, 2018. (ECF No. 16). Good cause exists to extend the time for Stipulating
2 Defendants to respond to the Complaint. This case involves multiple Defendants who were served
3 on different dates, and Stipulating Defendants have all retained Naylor & Braster as counsel. The
4 extension will establish a uniform date for all Stipulating Defendants to respond and will provide
5 sufficient time for Naylor & Braster to review the case.

6 This is the first stipulation for extension of time for time for Stipulating Defendants to
7 respond to Plaintiff's Complaint. This stipulation is made in good faith and will not prejudice any
8 party.

9 LIPSON NEILSON P.C.

NAYLOR & BRASTER

11 By: /s/ Kaleb D. Anderson
12 Kaleb D. Anderson
13 Nevada Bar No. 7582
14 9900 Covington Cross Drive, Suite 120
Las Vegas, NV 89144

By: /s/ Andrew J. Sharples
John M. Naylor
Nevada Bar No. 5435
Andrew J. Sharples
Nevada Bar No. 12866
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145

KENT, BEATTY & GORDON, LLP

Joshua B. Katz (*pro hac vice*)
Eleven Times Square
New York, NY 10036

*Attorneys for Defendants Pacific Payment
Technologies d/b/a Ubiquity, Tre'lage, LLC,
Neil Haboush, Neil Sollinger, Mark Soller,
Pasha Sollinger and Nancy LaBier*

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED that Defendants Pacific Payment Technologies d/b/a Ubiquity,
Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha Sollinger and Nancy LaBier have
up to and including August 17, 2018 to file an answer or otherwise respond to Plaintiff's Complaint

Dated this 2nd day of August 2018.


UNITED STATES MAGISTRATE JUDGE